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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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CATHAY BANK,

Case No. 17-CV-3551 (NG) (SIL)

Plaintiff,

**NOTICE OF MOTION**

-against-

JOSE ANTONIO BONILLA and JULIO CESAR  
MONTALVO, as Administrators for the Estate of  
PAULA MALLIARAKIS, deceased, pursuant to  
Limited Letters of Administration, GEORGE  
MALLIARAKIS a/k/a GEORGIOS MALLIARAKIS,  
26ROADASTORIA LLC, APHIS REALTY, INC.,  
1847 ASTORIA LLC, and DIONYSIOS KALIAMPOS,

Defendants.

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**PLEASE TAKE NOTICE**, that upon the Declaration of Brandon M. Zlotnick dated September 21, 2020, and the exhibits annexed thereto; the accompanying Memorandum of Law in Support; and upon all prior pleadings and proceedings had herein, Plaintiff will move this Court before the Honorable Steven I. Locke, United States Magistrate Judge, at the United States Courthouse for the Eastern District of New York, located at 100 Federal Plaza, Central Islip, New York 11722, on a date and time to be determined by the Court, for an order pursuant to Rules 15(a)(2) and 21 of the Federal Rules of Civil Procedure, granting Plaintiff leave to serve and file a second amended complaint in the form of Exhibit C to this motion, amended to (1) add

Dimitrios Pistikos as a defendant therein, and (2) add new allegations to, or revise existing allegations in, the amended complaint; and (3) granting such other, further, and different relief as this Court deems just and proper; and

**PLEASE TAKE FURTHER NOTICE**, that answering papers, if any, must be served on the undersigned within fourteen (14) days after service of the moving papers; and

**PLEASE TAKE FURTHER NOTICE**, that any reply papers by Plaintiff must be served within seven (7) days after service of the answering papers, if any.

Dated: Mineola, New York  
September 21, 2020

Respectfully submitted,

LAW OFFICES OF MICHAEL A. HASKEL

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